

Heather J. Hemin
CLERK OF THE COURT

Civil Cover Sheet

A-25-916476-C
Dept. 7

IN THE DISTRICT COURT OF CLARK COUNTY, NEVADA

Plaintiffs:

COLEMAN FAMILY REVOCABLE LIVING TRUST, by and through Trustees Sahar Lewis and
Pluyd Coleman

Defendants:

PNC BANK, N.A., MATRIX TRUST COMPANY, CLEAR RECON CORP, STEFANIE ARMIJO,
DOES 1 through 20

Case Number: (To be assigned)

Department: (To be assigned)

Nature of Action:

Real Property / Title to Real Property / Quiet Title / Wrongful Foreclosure

Amount in Controversy:

\$180,000,000.00 (Total Damages Claim under Federal Reserve Act Section 29)

Relief Sought:

- Injunctive relief to prevent foreclosure
- Declaratory relief for quiet title
- Damages in the amount of \$180,000,000.00 for breach of contract, slander of title, fraud, defamation, and violation of the Federal Reserve Act
- Punitive damages
- Attorney's fees and costs

Jury Demand:

No

Filed By:

Plaintiff, pro per (self-represented)

**DISTRICT COURT
CLARK COUNTY, NEVADA**

COLEMAN FAMILY REVOCABLE LIVING TRUST,
by and through its Trustees, SAHAR LEWIS and PLUYD COLEMAN,
Plaintiffs,

v.

PNC BANK, N.A.; MATRIX TRUST COMPANY; CLEAR RECON CORP; STEFANIE ARMIJO;
DOES 1 through 20, inclusive,
Defendants.

Case No.:

Dept. No.:

**VERIFIED COMPLAINT
FOR:**

1. Wrongful Foreclosure
2. Breach of Contract
3. Violations of RESPA
4. Securities Fraud and Misrepresentation
5. Quiet Title
6. Injunctive Relief
7. Declaratory Relief
8. Emergency Relief (TRO & Preliminary Injunction)
9. Slander of Title

Plaintiffs allege as follows:

I. PARTIES

1. Plaintiff, **Coleman Family Revocable Living Trust**, is the lawful owner of the property commonly known as 3139 Belvedere Dr, Henderson, NV 89014. Trustees Sahar Lewis and Pluyd Coleman act on behalf of the Trust.
2. Defendant **PNC Bank, N.A.** claims to be the lender.
3. Defendant **Matrix Trust Company** claims an interest as trustee for PNC.

4/9/25

Signature:

By:

Pluyd Coleman, Trustee

By:

Sahar Lewis, Trustee

, without recourse
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UCC 1-308

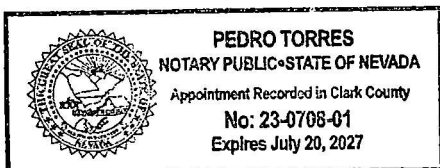
NEVADA NOTARY ACKNOWLEDGEMENT

(EXECUTION OF JURAT)

State of Nevada }

County of CLARK }

Signed and sworn (or affirmed) before me on 4/07/2025 [date] by
SAHAR A LEWIS AND PLETO COLEMAN JR [name(s) of
person(s) making statement].



(Seal)

Signature of notarial officer

NOTARY

Title (and Rank)

**DISTRICT COURT
CLARK COUNTY, NEVADA**

COLEMAN FAMILY REVOCABLE LIVING TRUST,
by and through its Trustees, SAHAR LEWIS and PLUYD COLEMAN,
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2. Defendant **PNC Bank, N.A.** claims to be the lender.
3. Defendant **Matrix Trust Company** claims an interest as trustee for PNC.

4. Defendant **Clear Recon Corp** is the foreclosure trustee issuing the Notice of Default and Notice of Sale.
5. Defendant **Stefanie Armijo** is named as an indentured trustee.
6. The true names and capacities of DOES 1 through 20 are unknown; Plaintiffs will amend this Complaint when their identities are ascertained.

II. JURISDICTION AND VENUE

7. This Court has jurisdiction pursuant to NRS 13.010 and NRS 30.010 et seq.
8. Venue is proper because the subject property is located in Clark County, Nevada.

III. STATEMENT OF FACTS

9. Plaintiffs lawfully acquired the subject property by way of Trust prior to any adverse claims.
10. Notice of the Trust transfer was provided to PNC Bank.
11. Plaintiffs fully performed under the contract.
12. Plaintiffs, as Trustees, accepted all rights, title, benefits, interests, and equity owed to Sahar Lewis, the original principal.
13. Plaintiffs tendered a negotiable instrument in good faith to PNC Bank.
14. PNC Bank dishonored the negotiable instrument in violation of UCC § 3-603.
15. Pursuant to UCC § 3-603, the debt was discharged by operation of law.
16. PNC failed to provide required forensic accounting.
17. PNC failed to validate their security interest after Qualified Written Request (QWR) was issued.
18. Plaintiffs received no response of substance from PNC, only boilerplate documents.
19. Despite this, Defendants issued a Notice of Default on December 2, 2024.

20. Notice of Trustee's Sale followed on March 27, 2025.

21. Sale is currently scheduled in approximately 30 days.

IV. CLAIMS FOR RELIEF

First Cause of Action: Wrongful Foreclosure

22. Plaintiffs repeat and reallege all preceding paragraphs.

23. Defendants lack legal standing to foreclose due to the discharged debt and failure to validate the loan.

24. Plaintiffs seek damages and injunctive relief.

Second Cause of Action: Breach of Contract

25. Plaintiffs performed under the contract and Defendants failed to honor the negotiable instrument.

Third Cause of Action: RESPA Violations

26. Defendants failed to properly respond to the QWR in violation of RESPA.

Fourth Cause of Action: Fraud and Misrepresentation

27. Defendants misrepresented their lawful ability to enforce the Note.

Fifth Cause of Action: Quiet Title

28. Plaintiffs seek to quiet title against Defendants' adverse claims.

Sixth Cause of Action: Injunctive Relief

29. Plaintiffs seek immediate injunctive relief to prevent irreparable harm.

Seventh Cause of Action: Declaratory Relief

30. Plaintiffs request a declaration that Defendants have no lawful interest in the property.

Eighth Cause of Action: Emergency Relief (TRO and Preliminary Injunction)

31. Plaintiffs request immediate emergency relief to stay the sale.

Ninth Cause of Action: Slander of Title

32. Defendants recorded false documents, clouding Plaintiffs' title.

V. DAMAGES

33. Pursuant to Section 29 of the Federal Reserve Act, and based on Defendants' continuous dishonor, fraud, and false reporting over a period of no less than six (6) months, Plaintiffs assert liquidated damages at a rate of **\$1,000,000.00 per day**, totaling

not less than **\$180,000,000.00**, subject to increase pending further proceedings.

34. Plaintiffs further assert entitlement to **punitive damages** in an amount not less than **\$180,000,000.00**, to punish and deter Defendants' willful misconduct.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request judgment against Defendants, and each of them, as follows:

1. For general damages in an amount of **\$20,000,000.00**;
2. For special damages in an amount of **\$30,000,000.00**;
3. For punitive damages in an amount of **\$180,000,000.00**, or as determined by the Court;
4. For statutory damages as provided by law;
5. For attorney's fees and costs of suit;
6. For declaratory relief and quiet title as requested herein;
7. For injunctive relief enjoining the foreclosure sale;
8. For such other and further relief as the Court deems just and proper.

VII. VERIFICATION

I, Pluyd Coleman, Trustee of the Coleman Family Revocable Living Trust, declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Dated: 4/9/25

By: [Signature]

Pluyd Coleman, Trustee

I, Sahar Lewis, Trustee of the Coleman Family Revocable Living Trust, declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Dated: 4/9/2025

By: Sahar-Amanda Lewis

Sahar Lewis, Trustee

[Signature], without prejudice, all rights reserved
UCC 1-308

Temporary Restraining Order (TRO) Motion

EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE RE: PRELIMINARY INJUNCTION

Plaintiffs, **Coleman Family Revocable Living Trust** (by and through its Trustees, Sahar Lewis and Pluyd Coleman), respectfully apply to this Court ex parte for the issuance of a **Temporary Restraining Order** and **Order to Show Cause** why a **Preliminary Injunction** should not issue to restrain the foreclosure sale of the property located at **3139 Belvedere Dr, Henderson, NV 89014**.

GROUND FOR APPLICATION:

1. **Immediate and Irreparable Harm:**

The foreclosure sale is scheduled to occur within the next 30 days, and Plaintiffs will suffer immediate, irreparable harm if the sale is allowed to proceed. The wrongful foreclosure and failure to honor the discharged debt have caused significant emotional distress, damage to credit, and reputational harm.

2. **High Likelihood of Success on the Merits:**

Defendants have no legal standing to foreclose, as the debt was discharged under UCC § 3-603 due to dishonor of the negotiable instrument by PNC Bank.

3. **Request for Liquidated Damages:**

Plaintiffs assert liquidated damages under Section 29 of the **Federal Reserve Act** in the amount of **\$1,000,000 per day** for no less than six months, totaling **\$180,000,000**. This claim is based on the dishonor and fraudulent actions of Defendants, which occurred over a period of no less than six months.

REQUESTED RELIEF:

1. **Temporary Restraining Order:**

Plaintiffs request that Defendants be immediately enjoined from proceeding with any foreclosure sale on the subject property until further orders of the Court.

2. **Order to Show Cause:**

Plaintiffs request that the Court set a hearing for Defendants to show cause why a **Preliminary Injunction** should not issue to further prevent any foreclosure action.

3. **Bond Amount:**

Plaintiffs request that the Court set a reasonable bond, reflecting the potential harm, to secure the injunction.

DATED this 9 day of April, 2025.

By: [Signature]
Pluyd Coleman, Trustee

By: [Signature]
Sahar Lewis, Trustee

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RECORDING REQUESTED BY:

Sahar Lews
3139 Belvedere Dr
Henderson, Nevada [89014]

WHEN RECORDED MAIL TO:

Coleman Family Revocable Living Trust
3139 Belvedere Dr
Henderson, Nevada [89014]

APN: 178-06-711-024

Property Address: 3139 Belvedere Dr, Henderson, Nevada 89014

NOTICE OF PENDENCY OF ACTION (LIS PENDENS)

NOTICE IS HEREBY GIVEN that a Verified Complaint has been filed in the above-entitled Court by the Plaintiff, [Your Name], as Trustee of the Coleman Family Revocable Living Trust, concerning the real property located at 3139 Belvedere Dr, Henderson, Nevada 89014, APN [Insert Parcel Number].

The nature of the action is for Quiet Title, Wrongful Foreclosure, Breach of Contract, Fraud, Violations of RESPA, Emergency Injunctive Relief, and related causes of action.

This action affects the title and right of possession of the real property described above.

Dated: 4/9/2025

Plaintiff in Pro Per

By: Sahar Aronson Lews, all rights reserved
UCE 1-308

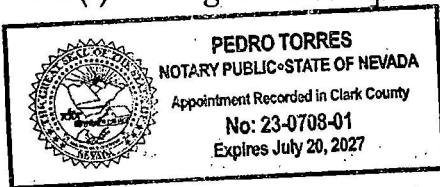
NEVADA NOTARY ACKNOWLEDGEMENT

(EXECUTION OF JURAT)

State of Nevada }

County of CLARK }

Signed and sworn (or affirmed) before me on 4/09/2025 [date] by
SAHAK A. LEVIS [name(s) of
person(s) making statement].



(Seal)



Signature of notarial officer

NOTARY

Title (and Rank)